

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:) CASE NO. 15 B 25228
) HON. DEBORAH L. THORNE
Kareem A. Lee and Chenice Laury,) CHAPTER 13
)
DEBTORS.)

NOTICE OF MOTION

TO: Marilyn O Marshall, 224 South Michigan Ste 800, Chicago, IL 60604, via electronic court notification;

See attached service list.

Please take notice that on May 15, 2019, at 9:30 A.M., in courtroom 613 of the United States Bankruptcy Court, Everett McKinley Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois 60604, I shall appear before the HONORABLE Deborah L. Thorne or before any judge sitting in his place and stead and shall then and there present the attached Motion at which place and time you may appear if you see fit.

PROOF OF SERVICE

The undersigned, an attorney, certifies that he transmitted a copy of this notice and the attached motion to the above-named creditor and also to the attached service list via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603 on April 4, 2019.

/s/ Roger Leshinsky
Attorney for Debtor

The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603
312-913-0625

Case 15-25228

Northern District of Illinois

Eastern Division

Thu Apr 4 10:39:43 CDT 2019

Recovery Management Systems Corporation
25 SE Second Avenue Suite 1120
Miami, FL 33131-1605

Rent-A-Center, Inc.
4407 W 5th Ave
Gary, IN 46406-1830

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

Afni, Inc.
Po Box 3097
Bloomington, IL 61702-3097

Allianceone
4850 E Street Rd Ste 300
Trevose, PA 19053-6643

Ars
1801 Nw 66th Ave
Fort Lauderdale, FL 33313-4571

Capital Recovery V, LLC
c/o Recovery Management Systems Corp
25 SE 2nd Avenue Suite 1120
Miami, FL 33131-1605

Capital Recovery V, LLC
c/o Recovery Management Systems Corp.
25 S.E. 2nd Avenue, Suite 1120
Miami, FL 33131-1605

Cci
Contract Callers I
Augusta, GA 30901

Cda/pontiac
Attn:Bankruptcy
Po Box 213
Streator, IL 61364-0213

Chase Auto Finance
P O Box 9001937
Louisville, KY 40290-1937

Condor Capital Corp
165 Oser Ave
Hauppauge, NY 11788-3710

Crd Prt Asso
Attn: Bankruptcy
Po Box 802068
Dallas, TX 75380-2068

ER Solutions/Convergent Outsourcing, INC
Po Box 9004
Renton, WA 98057-9004

Eastern Account System INC.
Attn: Bankruptcy Dept.
Po Box 837
Newtown, CT 06470-0837

First Premier Bank
3820 N Louise Ave
Sioux Falls, SD 57107-0145

Harris
Harris & Harris, Ltd.
111 W Jackson Blvd 400
Chicago, IL 60604-4135

Illinois Tollway
Attn: Legal Dept
2700 Ogden Ave
Downers Grove, IL 60515-1703

MCOA
Village of East Hazel Crest
Municipal Collections of America Inc
3348 Ridge Rd
Lansing, IL 60438-3112

MIDWEST EMERGENCY ASSOCIATES, LTD
6681 Country Club Drive
Golden Valley, MN 55427-4601

Mcsi Inc
Po Box 327
Palos Heights, IL 60463-0327

Municollofam
3348 Ridge Road
Lansing, IL 60438-3112

Navient
Po Box 9500
Wilkes Barre, PA 18773-9500

Navient Solutions, Inc. on behalf of GLHEC
2401 International Lane
Madison, WI 53704-3121

Nicor
P.O. Box 2020
Aurora, IL 60507-2020

PLS
1 S Wacker
Chicago, IL 60606-4603

Porania LLC
P. O. Box 11405
Memphis, TN 38111-0405

Portfolio Recovery Ass
120 Corporate Blvd Ste 1
Norfolk, VA 23502-4952(p)PORTFOLIO RECOVERY ASSOCIATES LLC
Document Page 3 of 5
PO BOX 41067
NORFOLK VA 23541-1067Premier Bank, LLC
c/o Jefferson Capital Systems LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999Premier Bankcard, Llc
c o Jefferson Capital Systems LLC
Po Box 7999
Saint Cloud Mn 56302-7999Regional Recovery Serv
5252 Hohman
Hammond, IN 46320-1723Security Credit Servic
Po Box 1156
Oxford, MS 38655-1156The Payday Loan Store
c/o Creditors Bankruptcy Service
P.O. Box 800849
Dallas, TX 75380-0849nicor gas
po box 549
Aurora il 60507-0549Aaron M Weinberg
The Semrad Law Firm, LLC
20 S. Clark St.
28th Floor
Chicago, IL 60603-1811Chenice Laury
15810 Willard Ave
Harvey, IL 60426-5128Kareem A. Lee
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Chicago, IL 60604-2503Patrick Semrad
The Semrad Law Firm, LLC
20 S. Clark St, 28th Floor
Chicago, IL 60603-1811Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027Rodion Leshinsky
The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603-1811The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).Portfolio Recovery Associates, LLC
successor to CAPITAL ONE BANK (USA), N.A
(ORCHARD BANK)
POB 41067
Norfolk VA 23541(d)Portfolio Recovery Associates, LLC
successor to CAPITAL ONE BANK (USA), N.A
POB 41067
Norfolk VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)ECMC
PO BOX 16408
ST. PAUL, MN 55116-0408(d)First Associates Loan Servicing, LLC
P.O. Box 503430
San Diego, CA 92150-3430(d)Rent A Center
4407 W 5th Ave
Gary, IN 46406-1830End of Label Matrix
Mailable recipients 44
Bypassed recipients 3
Total 47

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)
) CASE NO. 15 B 25228
Kareem A. Lee and Chenice Laury,) HON. DEBORAH L. THORNE
) CHAPTER 13
DEBTORS.)

MOTION TO MODIFY PLAN

NOW COMES the Debtors, Kareem A. Lee and Chenice Laury, by and through Debtors' attorneys, The Semrad Law Firm, LLC hereby moves this Honorable Court to Modify the confirmed Chapter 13 Plan, Debtors state the following:

1. On July 24, 2015, Debtors filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C.
2. On September 17, 2015, this Honorable Court confirmed the Debtors' Chapter 13 Plan.
3. The Chapter 13 Plan allows for secured creditors to be paid 100% of their allowed claims, and general unsecured creditors without priority to be paid 10% of their allowed claims.
4. The Chapter 13 Plan requires the debtor to make plan payments to the Chapter 13 Trustee in the amount of \$515.00 monthly for 36 months.
5. Mr. Lee's employment with Securitas USA ceased towards the end of January 2019. Mr. Lee was hired by Titan Security Services, Inc. near the end of February 2019. Due to the approximate one-month lapse in income, debtors accrued a plan payment default. Debtors are now in a position to make regular and ongoing trustee payments.
6. On April 4, 2019, Debtors' counsel filed an amended payroll order.
7. If the current default is deferred, the debtors will be able to resume making regular payments.

8. There is room in the plan to complete the case if the default is deferred.
9. Debtors respectfully request this Honorable Court to defer the current default to the end of the plan reorganization.
10. Debtors are in a position to proceed with the instant case.
11. Debtors filed the instant case in good faith and intend to complete the plan of reorganization.

WHEREFORE, the Debtors pray this Honorable Court for the following relief:

- A. That this Honorable Court to defer the current default to the end of the plan reorganization; and
- B. For such other and further relief as the Court deems fair and proper.

Respectfully submitted,

/s/ Roger Leshinsky
Attorney for Debtor

The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603
312-913-0625